



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107-4431

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NAWC WARMINSTER
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MAR 16 1995

Mr. Orlando Monaco
Naval Facilities Engineering Command
Environmental Contracts Branch
Mailstop No. 82
10 Industrial Highway
Lester, Pennsylvania 19113

Re: Naval Air Warfare Center (NAWC)

Dear Mr. Monaco:


This letter provides EPA comments on a Field Sampling Plan for Site 4 Engineering Evaluation/Cost Analysis (EECA). These comments generally complement EPA comments on a Draft Field Sampling Plan for the Site 4 EECA in a letter dated December 6, 1994.

1) As noted in the letter of December 6, soil sampling necessary to meet CERCLA requirements at Site 4 may be conducted either prior to or as part of a CERCLA removal response action. The subject soil sampling should support a final Record of Decision (ROD) and a Finding of Suitability to Transfer (FOST) for Site 4. At this time, EPA suggests the Navy consider sampling of surface soils and soils from "test pits" during (rather than prior to) a removal response action. To assure that the subject soil sampling supports the ROD and FOST to be signed by the Navy and EPA for Site 4, EPA requests ample opportunity to comment on any soil sampling plans that are developed and implemented as part of a removal response action.

2) Prior to undertaking any excavation activity within Site 4 (including test pits), soil gas samples should be collected. The soil gas sample stations should be spaced 25 feet apart and located along the length of trenches identified by the geophysical survey. Soil gas samples should be collected at a depth of 2 to 3 feet and at the soil/bedrock interface at each soil gas sample station. The removal response action should then consider the results of the soil gas sampling of concern.

Should you have any questions or comments regarding the above,
please give me a call.

Sincerely,



Darius Ostrauskas
Remedial Project Manager

cc: Tom Ames, NAWC
Kathy Davies
Andy Rola, B & V